

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

CLERK
U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF
NEW YORK

-----X 1-11-41982(jbr) 2011 JUL 29 P 2:54
IN RE:

WENDELL KEANE,
DEBTOR

AMENDED APPLICATION IN SUPPORT
OF ORDER TO SHOW CAUSE

-----X PROFFER OF PROFF

Wendell Keane, for his amended application in support of an order to show cause seeking an order determining as to the date the provisions of the automatic stay as per sections 524 & 727(b) U.S.C..

1. This amended application in support of an application to determine the date that the provision for an automatic stay per sections 524 & 727(b) U.S.C..
2. The Debtor as a matter of law is entitled to the Rules of Haines v Kernner.
3. Debtor Keane contends per said section said provisions were in full force and effect at at the date of filing.
4. NCC funding at this point must present a proffer of to controvert the same.
5. NCC Funding must present a proffer of proof showing an assignment of the same form DHPD.
6. Further, Major Holding must present a proffer of proof that said judgment was a tax lien.
7. The same was properly obtained as a judgment by DHPD not a Tax Lein, as such a proffer of proof must be presented to controvert the same.

8. The undue prejudice incurred by the same was the sale of premises without liein or judgment as it pertains to the premises known as 311 Franklin Avenue, Brooklyn, New York.
9. The State, City and County records are void of any documentation as per the RPAPL to acquire the same. As such no proffer of proof can be made.
10. Further being the same was sole as one parcel in con-junction.
11. Clerk at the Federal District Court stated that in an effort to enforce my first rights of equity redemption this application was needed.
12. The showcause warrants immediate and forthwith discretion to prevent further undue prejudice.

Base upon the aforementioned the relief requested must be granted as a matter of law forthwith. Revocation of any and all sales of the premises that were include for the same and similar relief and for such other and further this court deems just and proper.

Dated July 29, 2011



Wendell Keane (347)870-0023
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